UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SINGULAR COMPUTING LLC,	Civil Action No. 1:19-cv-12551-FDS
Plaintiff,	
v.	Hon. F. Dennis Saylor IV
GOOGLE LLC,	
Defendant.	

PLAINTIFF SINGULAR COMPUTING LLC'S UNOPPOSED MOTION TO IMPOUND PURSUANT TO LOCAL RULE 7.2

Pursuant to Local Rule 7.2 and the Protective Order in this case ("Protective Order"), ECF No. 87, plaintiff, Singular Computing LLC ("Singular"), respectfully requests the Court to impound (seal): Exhibits A, C, D, J and K to the Declaration of Kevin Gannon in support of Plaintiff's Motion for Leave to Supplement Infringement Contentions to Cite Accused Source Code (D355).

The Protective Order allows the parties to designate discovery material as "Highly Confidential - Source Code" or "Highly Confidential - Attorney's Eyes Only" after making a determination it "comprises or includes confidential, proprietary, and/or trade secret Source Code, disclosure of which to another Party or Non-party would create a substantial risk of serious harm that could not be avoided by less restrictive means" or "contains or reflects information that is extremely confidential and/or sensitive in nature and the Producing Party reasonably believes that the disclosure of such Discovery Material is likely to cause economic harm or significant competitive disadvantage to the Producing Party." *Id.* at ¶ 8(a).

The Protective Order requires a party intending to make court filings referring to material designated as "Highly Confidential - Source Code" or "Highly Confidential - Attorney's Eyes Only" to bring a motion to impound. *Id.* at ¶ 14. The following contain information that has been designated by one or both of the parties hereto as "Highly Confidential - Source Code" or "Highly Confidential - Attorney's Eyes Only" under the Protective Order:

- Exhibit A to the Declaration of Kevin Gannon.
- Exhibit C to the Declaration of Kevin Gannon.
- Exhibit D to the Declaration of Kevin Gannon.
- Exhibit J to the Declaration of Kevin Gannon.
- Exhibit K to the Declaration of Kevin Gannon.

Accordingly, redacted public versions of Exhibits A, C, D, J and K are attached hereto.

For the foregoing reasons, Singular respectfully requests that the Court permit it to file the above identified exhibits under seal. Singular further requests that the documents remain impounded until further Order by the Court, and that upon expiration of the impoundment that the documents be returned to Singular's counsel.

Dated: August 15, 2022   Respectfully submitted,

                                             /s/ Paul J. Hayes
                                             Paul J. Hayes (BBO #227000)
                                             Matthew D. Vella (BBO #660171)
                                             Kevin Gannon (BBO #640931)
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                                             ATTORNEYS FOR THE PLAINTIFF

LOCAL RULE 7.1(a)(2) CERTIFICATION

I hereby certify that counsel for Singular conferred with Defendant's counsel in a good-faith attempt to resolve or narrow the issue raised by this motion. Defendant's counsel informed me that Google does not oppose the relief sought in this motion.

/s/ Kevin Gannon

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Paul J. Hayes